

# **EXHIBIT 18**

**Subject:** Re: Collection Status Update

**Date:** Tuesday, June 1, 2021 at 3:20:18 PM Eastern Daylight Time

**From:** Emily Bear

**To:** Deutsch, Hillel

**CC:** Joshua S. Moskowitz, rob, Wolfgang Wilke, Nathan Binder

Hi Hillel,

We have not received any voice messages from Mr Opperman at this time.

Best way to proceed would to have him use the link we sent originally to schedule a time-

<https://tidycal.com/4discovery/mobile-remote-collection-kick-off>

Please let me know if you have any other questions.

Best,

Emily

**Emily Bear**

*Operations Manager*

Company logo

**O:** (312) 924-5761 ext. 20

**M:** (630) 702-9414

**E:** [emily@4discovery.com](mailto:emily@4discovery.com)

**A:** 215 N Green St, Chicago, IL 60607

*The world we live in is experiencing dramatic change, and 4Discovery is still committed to providing you with the highest quality service. If there's anything that we can do to support you during these times, please let me know.*

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On Jun 1, 2021, at 14:00, Deutsch, Hillel <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)> wrote:

Hi Emily,

Mr. Opperman has informed me that he attempted to reschedule and when no one answered he left a message with his phone number, but no one has contacted him. What's the best way to proceed?

Thanks,

Hillel

Hillel Deutsch

NYS Assistant Attorney General

144 Exchange Blv. Rochester, NY 14614

(585) 546-7430

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**From:** Emily Bear <[emily@4discovery.com](mailto:emily@4discovery.com)>

**Sent:** Friday, May 28, 2021 9:46 AM

**To:** Deutsch, Hillel <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)>

**Cc:** Joshua S. Moskovitz <[josh@moskovitzlaw.com](mailto:josh@moskovitzlaw.com)>; rob <[rob@ricknerpllc.com](mailto:rob@ricknerpllc.com)>; Wolfgang Wilke <[wolf@4discovery.com](mailto:wolf@4discovery.com)>; Nathan Binder <[nate@4discovery.com](mailto:nate@4discovery.com)>  
**Subject:** Collection Status Update

[EXTERNAL]

Hi Hillel,

Here are updates on each custodian:

Custodians that have not returned Kits and collections are complete:

- Edward Rice, Completed the Collection on Friday, May 21st, Did not return kit
- Peter Welkley, Completed the Collection on Wednesday, May 12th, Damaged Phone Escalated, Did not return kit

Custodians that have Kits that collections aren't complete:

- William Maryjanowski - Scheduled for Thursday June 3rd. Two Appointment Cancellations this week 5/24 - 5/28, has collection kit
- James Opperman - Never rescheduled after Friday, May 14 cancellation, Currently no Reschedule, has collection kit

Custodians that still have Kits where ongoing Technical issue are being troubleshot:

- Paul Palistrant - Recently failed Verification (No Call Logs extracted in Collection), rescheduling with the custodian to recollect Call Logs (First Phone Finished Fine, Second Phone had Call Log Issue)
- Cedrik Soria - Loose USB Port on Phone, Causes data connection to break and collection to fail. Moved to a secure location in his house where no one would touch it. Also sent him a cord with an extended USB Tip that is used for loose Ports to maintain a data connection. Collection restarted today at 10:00 AM EDT

Other Custodians:

- Michael Swiatowy - Never Scheduled Collection
- Roy Bright - Completed, Returned Kit
- Joseph Sullivan - Completed, Returned Kit

Please let us know if you have any further questions.

Best,  
Emily

**Emily Bear**  
*Operations Manager*

<[image001.jpg](#)>

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On May 27, 2021, at 13:38, Deutsch, Hillel <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)> wrote:

Emily,

Can you let me know which phones/accounts you have not yet been able to access, and which Defendants who have not had their data downloaded yet are not currently scheduled to have a download done?

Thanks,

Hillel

Hillel Deutsch

NYS Assistant Attorney General

144 Exchange Blv. Rochester, NY 14614

(585) 546-7430

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